



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 1, 2020

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

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RE: *United States v. Nazeem Francis, et al.*, 20 Cr. 213 (MKV)

Dear Judge Vyskocil:

The Government respectfully writes with the consent of all counsel to request an adjournment of the telephonic conference scheduled for June 3, 2020 due to pandemic-related logistical obstacles, namely the fact that the incarcerated defendants will not be able to participate and challenges faced by counsel in fully conferring with their clients regarding the conference. The parties propose the conference be rescheduled for a date in approximately 60 days. Should courthouse operations fail to normalize by the date of the new conference such that the incarcerated defendants can be produced in person, the Government would respectfully request that the Court schedule a teleconference or videoconference that would allow the incarcerated defendants to participate remotely.

In light of this request for an adjournment, the Government respectfully provides the following status report: The Government made an initial discovery production in early April consisting of approximately 250 gigabytes of data, primarily including controlled buy reports, surveillance videos, phone extractions, social media accounts, police reports, and recorded prison calls. Within the next 60 days, the Government expects to make an additional production consisting of additional surveillance videos, phone extraction reports, and social media accounts. Moreover, the capital case decisional process has not yet resolved. Accordingly, the Government respectfully submits that an exclusion of time under the Speedy Trial Act from June 3, 2020 through the next conference date would serve the ends of justice outweighing the interest of the public and the defendants in a speedy trial, as it would allow defense counsel to continue reviewing

Mary Kay Vyskocil
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United States District Judge